

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AYANNA ROSENBERG, individually, and on
behalf of all those similarly situated,

Plaintiff,

v.

CCS COMMERCIAL, L.L.C. (d/b/a Credit
Collection Services Commercial), and
PROGRESSIVE DIRECT INSURANCE
COMPANY,

Defendants.

NO. 2:17-CV-00476-MJP

ORDER GRANTING IN PART LCR37
SUBMISSION ON PLAINTIFF'S
MOTION TO COMPEL

This matter having come before the undersigned judge of the above-entitled Court on
LCR37 Joint Motion Submission on Plaintiff's Motion to Compel, having reviewed Plaintiff's
Submission (Dkt. No. 33), and being fully advised, now therefore:

IT IS ORDERED that Defendant's general objections are STRICKEN, and Defendant is
ordered to supplement its responses.

As to **Interrogatory No. 11**, It Is Hereby Ordered:

*Defendant must answer regarding any notices or written policies for when collection
notices are to be used and what the notices should contain.*

ORDER GRANTING IN PART LCR37 SUBMISSION ON
PLAINTIFF'S MOTION TO COMPEL (2:17-CV-00476-
MJP) - 1

1 As to **Interrogatory No. 12, It Is Hereby Ordered:**

2 Defendant will further supplement its prior responses to supply the case number, venue
3 and case name of any Washington-filed suits (other than Panag and Stevens) brought against
4 the named CCS party in this suit, within the four years prior to this litigation. These
5 supplemental responses must be provided within seven (7) days of this order.

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7 As to **Interrogatory No. 13, It Is Hereby Ordered:**

8 Defendant will supply the names of all insurance companies doing business in
9 Washington that, over the four years preceding this lawsuit, have engaged CCS or been
10 assisted by CCS in attempting to collect sums claims to be owed as a result of the respective
11 insurance company's claimed subrogated interests.

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13 As to **Request for Production No. 3, It Is Hereby Ordered:**

14 Defendant will turn over a complete file of all communications in all forms with
15 Plaintiff.

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17 As to **Request for Production No. 4, It Is Hereby Ordered:**

18 Defendant will produce all documents concerning or relating to any efforts by
19 Defendant, or anyone acting on its behalf, to collect any sum of money from Plaintiff for any
20 reason.

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22 As to **Request for Production No. 10, It Is Hereby Ordered:**

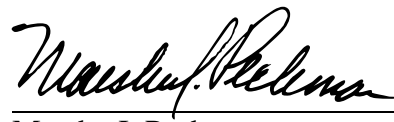
23 Defendant will produce all the templates for the form letters that it uses, or has used in
24 the four years preceding the initiation of this suit, in connection with pursuit of the collection
25 (in the State of Washington or in connection with insureds from the State of Washington) of
26 amounts claimed to be owed as a result of an insurer's subrogated interests.

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2 As to **Request for Production No. 18**, It Is Hereby Ordered:

3 *This request is DENIED in light of Plaintiff's offer to limit the scope of its requests to*
4 *the templates of the form letters used by Defendant (as described in the ruling on Request for*
5 *Production No. 10).*

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7 The clerk is directed to provide copies of this order to all counsel.

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9 Dated: January 19, 2018

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12 _____
13 Marsha J. Pechman
14 United States District Judge
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on January 19, 2018, I electronically filed the foregoing with the
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to all
4 counsel of record

5 DATED at Seattle, Washington, this 19th day of January, 2018.

6
7 /s/ Chase C. Alvord

8 Chase C. Alvord, WSBA #26080

9 calvord@tousley.com

Tousley Brain Stephens PLLC

Attorneys for Plaintiff

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